

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

<b>In the matter of</b>	)	
<b>BEHROUZ KHALILY</b>	)	
<b>Plaintiff</b>	)	
<b>V.</b>	)	<b>Case No. 08 C 1515</b>
	)	<b>Judge Kendall</b>
	)	
<b>CITY OF CHICAGO, et al</b>	)	
<b>Defendants</b>		

**MOTION TO APPOINT SPECIAL ADMINSTRATOR**

Now comes the Plaintiff Behrouz Khalily, by and through his attorney Dennis Both and moving for the Appointment of a Special Administrator of the estate of Defendant Richard Francis states as follows.

Defendant Richard Francis died and his death was spread of record. A review of the records of the Clerk of Court for the Circuit Court, of Cook County, Probate Department reveals that no estate has been opened for Richard Francis and the Co- Defendant City of Chicago has not appointed a special administrator.

Pursuant to Rule 25 of the Federal Rule of Civil Procedure any party may make a motion for substitution of party.

Attorney Benjamin Kelly is over the age of 18 years, licensed to practice law in the State of Illinois and is competent to serve as Special Administrator for the estate of Richard Francis.

Wherefore, the Plaintiff pray this Honorable Court enter an Order naming Benjamin Kelly as Special Administrator of the Estate of Richard Francis as substitute Defendant for Richard Francis deceased.

Respectfully submitted,

BROWN, UDELL & POMERANTZ, LTD.

By: /s/ Dennis E Both  
One of its attorneys

BROWN, UDELL & POMERANTZ,  
1332 N. Halsted Street  
Suite 100  
Chicago, Illinois 60622  
312.475.9900 (Office)

312.475.1188 (Fax)